

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
Philadelphia Division**

Bernice Louellen Shippen,

Debtor.

Case No. 25-10238-AMC  
Chapter 13

**Motion to Extend the Automatic Stay**

Debtor Bernice Louellen Shippen, through their attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on January 20, 2025. They have filed a plan and all schedules, statements, and other documents required by 11 U.S.C. §521(a)(1) and Fed. R. Bankr. P. 1007(b).

2. The Debtor was involved in one active bankruptcy between January 21, 2024, and January 20, 2025:

Case No.	District	Filed	Dismissed	Reason
24-11427	PAEB	04/29/2024	09/20/2024	Failure to make plan payments

3. Because the Debtor was involved in only one active bankruptcy between January 21, 2024, and January 20, 2025, the automatic stay is set to expire on February 19, 2025. 11 U.S.C. § 362(c)(3)(A).

4. The Court may extend the automatic stay when a case is filed in good faith as to the creditors to be stayed. Good faith means that there are new circumstances demonstrating that the Debtor can probably reach the end of a chapter 13 plan. *In re Legree*, 285 B.R. 615, 620 (Bankr. E.D. Pa. 2002).


5. This case was filed in good faith. The Debtor's income has increased since the dismissal of the prior case.

6. Because this case was filed in good faith, the Court must continue the automatic stay against all creditors until the Debtor receives a discharge.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: January 21, 2025

CIBIK LAW, P.C.  
*Counsel for Debtor*

By:   
Michael A. Cibik (#23110)  
1500 Walnut Street, Suite 900  
Philadelphia, PA 19102  
215-735-1060  
mail@cibiklaw.com